

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

2018 JUN -6 AM 11:09

U.S. COURTS
SOUTHERN DISTRICT
OF TEXAS

UNITED STATES OF AMERICA

v.

CODY MORGANTHALER
EDELMIRO MARTINEZ
EDUARDO LOPEZ
INOCENTE SANCHEZ

§
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§
§
§
§
§

CRIMINAL NO.

L-18-0429

DS

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

Between on or about October 13, 2017, and on or about October 15, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**CODY MORGANTHALER,
EDELMIRO MARTINEZ,
EDUARDO LOPEZ, and
INOCENTE SANCHEZ,**

while airborne in an aircraft, did shoot and attempt to shoot for the purpose of capturing and killing any bird, fish, and other animal, that is an Aoudad (*Ammotragus Lervia*), in violation of the Airborne Hunting Act, Title 16, United States Code, Section 742j-(a)(1) and Title 18, United States Code, Section 2.

COUNT TWO

Between on or about October 13, 2017, and on or about October 15, 2017, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**CODY MORGANTHALER,
EDELMIRO MARTINEZ,
EDUARDO LOPEZ, and
INOCENTE SANCHEZ,**

while airborne in an aircraft, did shoot and attempt to shoot for the purpose of capturing and killing any bird, fish, and other animal, that is an Blackbuck Antelope (*Antilope Cervicapra*), in violation of the Airborne Hunting Act, Title 16, United States Code, Section 742j-(a)(1) and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

The allegations contained in Count(s) One and Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 16, United States Code, Section 742j and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses in violation of Title 16, United States Code, Section 742j (*i.e.*, the Airborne Hunting Act) as set forth in Count(s) One and Two of this Information, Defendant(s),

**CODY MORGANTHALER,
EDELMIRO MARTINEZ,
EDUARDO LOPEZ, and
INOCENTE SANCHEZ,**

shall forfeit to the United States pursuant to Title 16, United States Code, Section 742j, all birds, fish, and other animals shot and captured contrary to the provisions of this section, or of any regulation issued hereunder, and all guns, aircraft, and other equipment used to aid in the shooting, attempting to shoot, capturing, and harassing of any bird, fish and other animal in violation of Title 16, United States Code, Section 742j, including but not limited to the following:

1. one (1) Aoudad (*Ammotragus Lervia*),
2. one (1) Blackbuck Antelope (*Antilope Cervicapra*),
3. one (1) Remington Model 700, chambered in 6.5 millimeter Creedmoor, with Serial Number: 99F001784GB,

4. one (1) Sig Sauer 3-15x44 rifle scope, and
5. one (1) black hard cover gun case.

RYAN K. PATRICK
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'CD Santos', written over a horizontal line.

CHRISTOPHER DOS SANTOS
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION
FILE: 18-3010
CRIMINAL INFORMATION

Filed: 6/6/18

NO.
L-18-0429
Judge: _____

UNITED STATES OF AMERICA

VS.

ATTORNEYS:
RYAN K. PATRICK, USA
CHRISTOPHER DOS SANTOS, AUSA

CODY MORGANTHALER
EDELMIRO MARTINEZ
EDUARDO LOPEZ
INOCENTE SANCHEZ

DS

CHARGE:

Cts. 1-2: Using aircraft to shoot or attempt to shoot for the purpose of capturing or killing an animal [16 USC 742j-1 (a)(1)]

TOTAL COUNTS: 2

PENALTY:

Cts. 1-2: Imprisonment not more than one year; a fine of not more than \$5,000; not more than 1 year term of supervised release; \$25 Special Assessment.

NOTICE OF FORFEITURE

In Jail:

On Bond:

Name & Address of Surety:

No Arrest: